City of New York v. Amerada Hess, et al., Case No. 04-CV-3417 (SDNY)

In re MTBE Products Liability Litigation, MDL 1358

TABLE OF EXHIBITS

EXHIBIT	DESCRIPTION	DATE
A	Contention Discovery	
A1	Certain Defendants' First Set of Interrogatories and Document Requests Regarding Punitive Damages	11/18/08
A2	Citgo Defendants' First Set of Company-Specific Interrogatories and Document Requests	11/18/08
A3	Defendants' Contention Interrogatories and Document Requests on Causation, Theories of Liability and Apportionment of Damages	11/19/08
A4	Atlantic Richfield Company's First Set of Interrogatories and Requests for Production of Documents to Plaintiff City of New York	11/19/08
A5	BP Products of North America Inc.'s First Set of Interrogatories and Requests for Production of Documents to Plaintiff City of New York	11/19/08
A6	Defendants El Paso Merchant Energy-Petroleum Company's and Coastal Eagle Point Oil Company's First Set of Company-Specific Interrogatories and Document Requests	11/19/08
A7	Defendant Gulf Oil Limited Partnership's Requests for Admission, Interrogatories and Requests for Production to Plaintiff City of New York	11/19/08
A8	The Premcor Refining Group Inc.'s First Set of Interrogatories and Requests for Production of Documents to Plaintiff City of New York	11/19/08
A9	Defendants Sunoco, Inc. and Sunoco, Inc. (R&M)'s First Set of Company-Specific Interrogatories and Document Requests	11/19/08
A10	Total Petrochemicals USA, Inc's First Set of Interrogatories and Requests for Production of Documents to Plaintiff City of New York	11/19/08

A11	Valero Defendants and Ultramar Defendants' First Set of Interrogatories and Requests for Production of Documents to Plaintiff City of New York	11/19/08
В	Responses and Objections	
B1	Plaintiff City of New York's Responses and Objections to Certain Defendants' First Set of Interrogatories and Document Requests Regarding Punitive Damages	12/18/08
B2	Plaintiff City New York's Responses and Objections to Citgo Defendants' First Set of Company-Specific Interrogatories and Document Requests	12/18/08
В3	Plaintiff City of New York's Responses and Objections to Defendants' Contention Interrogatories and Document Requests on Causation, Theories of Liability and Apportionment of Damages	12/19/08
B4	Plaintiff City of New York's Responses and Objections to Atlantic Richfield Company's First Set of Interrogatories and Requests for Production of Documents	12/19/08
B5	Plaintiff City of New York's Responses and Objections to BP Products North America Inc.'s First Set of Interrogatories and Requests for Production of Documents	12/19/08
B6	Plaintiff City of New York's Responses and Objections to Defendants El Paso Merchant Energy-Petroleum Company and Coastal Eagle Point Oil Company's First Set of Company-Specific Interrogatories and Document Requests	12/19/08
В7	Plaintiff City of New York's Responses and Objections to Defendant Gulf Oil Limited Partnership's Requests for Admission, Interrogatories and Requests for Production	12/19/08
B8	Plaintiff City of New York's Responses and Objections to the Premcor Refining Group Inc.'s First Set of Interrogatories and Requests for Production of Documents	12/19/08
B9	Plaintiff City of New York's Responses and Objections to Defendants Sunoco, Inc. and Sunoco, Inc. (R&M)'s First Set of Company-Specific Interrogatories and Document Requests	12/19/08
B10	Plaintiff City of New York's Responses and Objections to Total Petrochemicals USA, Inc.'s First Set of Interrogatories and Requests for Production of Documents	12/19/08

B11	Plaintiff City of New York's Responses and Objections to Valero Defendants and Ultramar Defendants' First Set of Interrogatories and Requests for Production of Documents	12/19/08
C	Meet and Confer Correspondence	
C1	Email from N. Campins to Counsel Re: Request for Extension for the City's Response to Contention Interrogatories	12/15/08
C2	Email from J. Pardo to N. Campins Re: Request for Extension	12/16/08
C3	Email from N. Campins to J. Pardo Re: Request for Extension	12/17/08
C4	Letter from J. A. Langan to S. Amron Re: Encl. List of Discovery Responses	3/3/09
C5	Letter from N. Campins to J.A. Langan Re: Contention Discovery	3/4/09
C6	Letter from J. A. Langan to N. Campins Re: Contention Discovery	3/6/09
D	Excerpt from October 31, 2007 MDL Status Conference	
E	Case Management Order # 31	11/6/07
F	Letter from G. Weintraub to S. Amron Re: Encl. Citgo's Second Amended Responses and Objections to City of New York's Fourth Set of Interrogatories	3/4/09
G	Examples of Specific Objections	12/18/08 12/19/08
G1	Example of Objection to Request as Based on Invalid Legal Assumptions	
G2	Example of Objection to Request as Seeking Attorney Work Product	
G3	Example of Objection to Request as Seeking information within the Control of Defendants	
G4	Example of Objection to Definitions as Vague and Ambiguous	